

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

<b>A.T. LYNNE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>No. 20-566C</b>
	)	
<b>THE UNITED STATES,</b>	)	<b>(The Honorable David A. Tapp)</b>
	)	
<b>Defendant.</b>	)	

**JOINT STATUS REPORT**

In accordance with the Court's Order dated November 2, 2022, the parties, plaintiff, A.T. Lynne, and defendant, United States, respectfully submit this joint status report.

The parties continue to engage in settlement discussions. Defendant is waiting on certain decisions from the Agency as to the terms of the counteroffer that it is willing to present. In the event that the parties are unable to resolve this matter, they respectfully propose the following schedule:

- Plaintiff's Motion for Summary Judgment – April 7, 2023
- Defendant's Response to Motion for Summary Judgment – May 5, 2023
- Plaintiff's Reply in Support of Motion for Summary Judgment – May 19, 2023
- Status Conference – May 25, 2023
- Pre-Trial Conference – July 31, 2023<sup>1</sup>

Respectfully submitted,

/s/ Jacob Y. Statman  
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Acting Assistant Attorney General  
  
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Director

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<sup>1</sup> Counsel of record for the Plaintiff will be out of the country from August 1 – August 15, 2023.

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December 1, 2022

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of December, 2022, a copy of the foregoing JOINT STATUS REPORT was filed electronically. This filing was served electronically to all parties by virtue of the court's electronic filing system.

/s/ Jacob Y. Statman  
JACOB Y. STATMAN